

AR201-13120

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Christine Todd Whitman  
US Environmental Protection Agency  
PO Box 1473  
Merrifield VA 22116

Re: Response to Comments 1,3,5-Trioxane (CAS Number 110-88-3).

Dear Administrator Whitman;

The Trioxane Manufacturers' Consortium is pleased that the EPA recognized the effort and thoroughness that went into the preparation of this document. It was our goal to meet the high standards for quality set by the EPA and to utilize all available information to avoid conducting any unnecessary animal testing related to the HPV program.

The document had been revised, according to the EPA comments, adding the assumptions and inputs that went into the Fugacity calculations, adding selected data to the mouse lymphoma study, adding selected information about testing conditions to the fish and invertebrate studies and correcting the typographical error in the acute dermal study. All study results remain the same for these studies. As this revision caused changes on several pages, a copy of the entire revised document is enclosed. It is clearly marked on the title page as a revised document.

This completes the HPV review of 1,3,5-Trioxane as the document shows and EPA agrees that no additional testing is required under the HPV initiative. If there are any questions concerning this submission please contact me as a representative of the Consortium

Sincerely,

Elmer Rauckman PhD, DABT  
Toxicologist for the Trioxane HPV Consortium

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